

AB:MEF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C., § 2252(a)(4)(B))

RAMAZAN ZUBERI,

No. 18-965 M

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN PAPLOW, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), duly appointed according to law and acting as such.

On or about October 10, 2018, the defendant RAMAZAN ZUBERI did knowingly possess one or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(4)(B)).

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been employed as a Special Agent of the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI") for 12 years. While employed by HSI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. On or about October 10, 2018, the defendant RAMAZAN ZUBERI arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Delta Flight 445 from the Rome, Italy.

4. At JFK, the defendant was selected for secondary inspection. U.S. Customs and Border Patrol ("CBP") officers conducted an examination of the defendant's baggage. The officers located one Black Sony HD handycam, 3 compact discs, 9 DVDs, and one black and grey thumb drive. A CBP officer questioned the defendant about the flash drive, and the defendant became very nervous, in that he began to stutter and hesitate in answering questions. The defendant stated in substance that he used the flash drive for work,

but he was not working on his recent trip. The defendant further stated that he accessed the flash drive by connecting it to his laptop, but he was not traveling with his laptop. The defendant was also questioned about the DVDs, but he was unable to explain exactly from whom he got them or what they contained.

5. Thereafter, the CBP officer asked the defendant to see his cellphone, and the defendant opened a black Android cellphone to the CBP Officer. The CBP officer conducted a cursory review of the photos and videos on the defendant's phone and located two videos highly graphic videos of men being tortured, one with a machete and the other by stoning. Thereafter, the CBP officer located one video file containing sexually explicit images of a child. Your Affiant reviewed the file, which is available for the Court's review. It is described as follows:

- a. **"StickCapt_JVid_(78.avi)"** is a video which depicts a partially nude prepubescent girl, dancing to music in what appears to be a child's bedroom. The girl's pants are pulled down around her knees, and she repeatedly lifts up her shirt. The girl has no pubic hair and only partially developed breasts. In the video, she repeatedly bends over so that her vagina and buttocks are visible from behind. She also spreads her labia and her buttocks. The girl also inserts what appears to be a straw into her anus and then licks it. Both the girl's face and genitalia are visible at numerous points during the video.


When the defendant was questioned about the videos, he acknowledged that they were on his phone but claimed that other people sent them to him.

6. In 2002, the defendant was indicted in New Jersey State Court on multiple charges related to the sexual exploitation of children. On September 22, 2003, the defendant was convicted of violating N.J.S.A. § 2C:24-4B (4) (Endangering Welfare of Child in the Second Degree), which provides in relevant that "Any person having a legal duty for the care of a child or who has assumed responsibility for the care of a child who causes the

child harm that would make the child an abused or neglected child . . . is guilty of a crime of the second degree; (4) [] if he photographs or films a child in a prohibited sexual act or in the simulation of such an act or for portrayal in a sexually suggestive manner or who uses any device, including a computer, to reproduce or reconstruct the image of a child in a prohibited sexual act or in the simulation of such an act or for portrayal in a sexually suggestive manner.” The defendant was sentenced to four years’ incarceration and was required to register as a sex offender.

7. I have reviewed the defendant’s travel records and observed that the trip he was returning from began on September 10, 2018, when he flew from New York to Albania, via a connection through Rome, Italy. The above referenced file, “StickCapt_JVid_(78.avi” is dated October 3, 2018 at 10:19 p.m., is 57.49 MB, and has a file path of “/Internal Storage/Download.”

WHEREFORE, your deponent respectfully requests that the defendant
RAMAZAN ZUBERI be dealt with according to law.



JONATHAN PAPLOW
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
11th day of October, 2018

THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK